UNITED STATES DISTRICT COURT DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA, :

Plaintiff, : Criminal Action

No. 19-10080-NMG

v. :

DAVID SIDOO, et al.,

Defendants. :

DEFENDANT MARCI PALATELLA'S MEMORANDUM REGARDING TRIAL GROUPINGS

Defendant Marci Palatella respectfully files this memorandum in response to the Court's Order directing the parties to propose how to group the defendants for trial if it becomes necessary to have multiple trials in this matter (Dkt. 705) and in response to the government's such proposal (Dkt No. 799).

Should the Court determine it is in the interests of justice to schedule trials now in advance of any rulings on substantive motions, including motions by the defendants relevant to venue and to dismiss, Ms. Palatella concurs with the government's second proposal (of three trials) with Ms. Palatella included in the second trial. Ms. Palatella concurs with the view expressed by other defendants that it is not in the interests of justice to schedule any of the trials in 2020, given the continued production of discovery by the government in this year.

Dated: February 12, 2020 Boston, Massachusetts Respectfully submitted,

/s/ Michael K. Loucks

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Counsel for Defendant Marci Palatella

CERTIFICATE OF SERVICE

I, Michael K. Loucks, hereby certify that this document filed through the CM/ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing and paper copies will be sent to those indicated as non-registered participants, if any, on February 12, 2020.

Dated: February 12, 2020 /s/ Michael K. Loucks

Michael K. Loucks